

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Andrew Green and Shirley Green, as legal)
guardians of N.G. (a minor child) and)
Andreia Samoria Green;) Case No. 2:19-cv-00366-RMG
)
Plaintiffs,)
)
v.)
)
Kanye West; Getting Out Our Dreams, II,)
LLC; UMG Recordings, Inc. a/k/a)
Universal Music Group; Def Jam)
Recordings; Cydel Young d/b/a Mr. Redan)
Music a/k/a Mr. Redan; BMG Rights)
Management (US), LLC a/k/a BMG)
Platinum Songs US and John Does 1-30;)
)
Defendants.)
)

)

**CONSENT NOTICE OF FILING
VERIFIED PETITION
FOR APPROVAL OF MINOR
SETTLEMENT**

COME NOW Plaintiffs Andrew Green and Shirley Green, as legal guardians of N.G. (a minor child) and Andreia Samoria Green, who, with the consent of Defendants Kanye West, Getting Out Our Dreams, II, LLC, UMG Recordings, Inc. a/k/a Universal Music Group, Def Jam Recordings, in compliance with this Court's Order dated December 14, 2020 (ECF Entry 133), and hereby file the unredacted Verified Petition for Approval of Minor Settlement dated November 1, 2020 (which was initially filed in redacted form at ECF Entry 129-1 on November 1, 2020) ("Verified Petition").

The Verified Petition is incorporated herein and respectfully presented to the Court for its further consideration and approval in accordance with S.C. Code 62-5-433 and Local Civil Rule 17.02, DSC, as the proposed settlement of this action. No changes have been made to the Verified Petition other than the removal of the redactions. The Verified Petition (on the fourth page)

references a “Confidential Settlement and Release Agreement.” In light of the Court’s recent orders on the Consent Motion to Seal (ECF Entry 129) and the Joint Motion for Reconsideration (ECF Entry 131), the Confidential Settlement and Release Agreement has been modified to state that the filing of the Verified Petition in unredacted form is allowable and necessary to obtain approval and carry out the terms of the settlement.

WHEREFORE, having filed the Verified Petition with the Court in unredacted form, in specific accordance with this Court’s Order dated December 14, 2020, the Parties request that the Court approve the minor settlement set forth in the Verified Petition, which will allow for the full and final resolution of this dispute.

Respectfully submitted,

LESEMANN AND ASSOCIATES LLC

By: s/ Ellis R. Lesemann
Ellis R. Lesemann (Federal Bar No. 7168)
erl@lalawsc.com

J. Taylor Powell (Federal Bar No. 12265)
jtp@lalawsc.com

Michelle A. Matthews (Federal Bar No. 12460)
mam@lalawsc.com
418 King Street, Suite 301
Charleston, SC 29403
(843) 724-5155

and

JASON SCOTT LUCK, ATTORNEY AT LAW
Jason Scott Luck (Fed ID No. 9696)
jason@luck.law
107 S. Parsonage St. (P.O. Box 47)
Bennettsville, SC 29512
843.479.6863

ATTORNEYS FOR PLAINTIFFS ANDREW GREEN AND SHIRLEY GREEN, AS LEGAL GUARDIANS OF N.G. (A MINOR CHILD) AND ANDREIA SAMORIA GREEN

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: *s/ Robert W. Whelan*

John C. McElwaine (Federal Bar No. 6710)

E-Mail: john.mcelwaine@nelsonmullins.com

Robert W. Whelan (Federal Bar No. 9242)

E-Mail: robert.whelan@nelsonmullins.com

M. Kathleen McGhee Mellen (Federal Bar No. 11652)

E-Mail: katie.mellen@nelsonmullins.com

151 Meeting Street / Sixth Floor

Post Office Box 1806 (29402-1806)

Charleston, SC 29401-2239

(843) 853-5200

and

MITCHELL SILBERBERG & KNUPP LLP

Eleanor M. Lackman (*admitted pro hac vice*)

E-mail: eml@msk.com

Mark Humphrey (*admitted pro hac vice*)

E-mail: mxh@msk.com

2049 Century Park East, 18th Fl.

Los Angeles, CA 90067

(310) 312-2000

ATTORNEYS FOR DEFENDANTS KANYE WEST, GETTING OUT OUR DREAMS, II, LLC, DEF JAM RECORDINGS AND UMG RECORDINGS, INC.

December 17, 2020

Charleston, South Carolina